

JUDGE THOMAS O. RICE

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON AT SPOKANE

JAMES LEIGHTY,

Plaintiff,

v.

SPOKANE COUNTY, a municipal
corporation; SHERIFF JOHN NOWELS,
an individual; and SPOKANE COUNTY
SHERIFF'S OFFICE, a subdivision of a
municipal corporation,

Defendants.

No. 2:24-cv-00165-TOR

REPLY DECLARATION OF MIKA
ROTHMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION

NOTED: JULY 8, 2024

WITHOUT ORAL ARGUMENT

I, Mika Rothman, declare as follows:

1. I am one of the attorneys for Plaintiff James Leighty. I am over the age of 18, and am competent to testify.

2. On June 19, 2024, SCSO posted on its Facebook page about an arrest of a suspect. **Exhibit 1** is a true copy of the post showing comments on the post that

DECLARATION OF MIKA ROTHMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION - 1

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1 remain visible on the SCSO Facebook page. Comments cited by Plaintiff in his
2 Reply are highlighted on pages 4 and 5 of Exhibit 1.

3 3. On June 11, 2024, SCSO posted on its Facebook page about an arrest
4 of a suspect. **Exhibit 2** is a true copy of the post showing comments on the post that
5 remain visible on the SCSO Facebook page. Comments cited by Plaintiff in his
6 Reply are highlighted on pages 3, 6, and 7 of Exhibit 2.

7 4. On May 28, 2024, SCSO posted on its Facebook page about an arrest
8 of a suspect. **Exhibit 3** is a true copy of the post showing comments on the post that
9 remain visible on the SCSO Facebook page. Comments cited by Plaintiff in his
10 Reply are highlighted on pages 4 and 5 of Exhibit 3.

11 I declare under penalty of perjury of the laws of the United States of America
12 and the State of Washington that the foregoing is true and correct.

13 DATED this 27th day of June, 2024, at Seattle, Washington.

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15 /s/Mika Rothman
Mika Rothman
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CERTIFICATE OF SERVICE

I certify that on the date noted below I electronically filed this document entitled **Reply Declaration of Mika Rothman in Support of Plaintiff's Motion for Preliminary Injunction** with the Clerk of the Court using the CM/ECF system.

EVANS, CRAVEN & LACKIE, P.S

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*Attorney for Defendants Spokane
County, John Nowels, and Spokane
County Sheriff's Office*

☒ Via Clerk of the Court (CM/ECF System)

☐ Via Facsimile

☐ Via First Class Mail

☐ Via Email

☐ Via Overnight Delivery

DATED this 27th day of June, 2024, at Seattle, Washington.

/s/Olivia Doolan

Olivia Doolan, Legal Assistant

DECLARATION OF MIKA ROTHMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION - 3

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